REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) _____ Patricia L. Drake _____ Case No. ____ 18-10097 ____ Chapter __ 13 __

All Cases: Moving Creditor ___ Kingsbrook Crossing Homeowners Association ___ Date Case Filed ____ 4/6/2018 ____

Nature of Relief Sought: ☑ Lift Stay   ☐ Annul Stay   ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed ____ 06/22/2018 ____

Chapter 7: ☐ No-Asset Report Filed on _____
       ☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1.   Collateral
    a.   ☑ Home
    b.   ☐ Car   Year, Make, and Model _____
    c.   ☐ Other (describe)_____

2.   Balance Owed as of Petition Date $ _____ 7,258.22 _____
    Total of all other Liens against Collateral $_____ Unknown _____

3.   In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4.   Estimated Value of Collateral (must be supplied in *all* cases) $ _____ 156,000.00 _____

5.   Default
    a.   ☑ Pre-Petition Default   + attorney's fees, and
        Number of months _____   Amount $ _____ 7,258.22 _____ costs.

    b.   ☐ Post-Petition Default
        i.   ☐ On direct payments to the moving creditor
            Number of months _____   Amount $ _____

        ii.   ☐ On payments to the Standing Chapter 13 Trustee
            Number of months _____   Amount $ _____

6.   Other Allegations
    a.   ☑ Lack of Adequate Protection § 362(d)(1)
        i.   ☐ No insurance
        ii.   ☐ Taxes unpaid   Amount $ _____
        iii.   ☐ Rapidly depreciating asset
        iv.   ☑ Other (describe) _____ Accruing lien for unpaid association assessments _____

    b.   ☑ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

    c.   ☑ Other "Cause" § 362(d)(1)
        i.   ☐ Bad Faith (describe)_____
        ii.   ☐ Multiple Filings
        iii.   ☑ Other (describe) _____ Default under Movant's Declarations _____

    d.   Debtor's Statement of Intention regarding the Collateral
        i. ☐ Reaffirm   ii ☐ Redeem   iii. ☐ Surrender   iv. ☑ No Statement of Intention Filed

Date: _____ February 19, 2019 _____   _____
                                              Counsel for Movant
(Rev. 12 /21/09)